

# EXHIBIT 2

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

UMG RECORDINGS, INC., et al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 1:17-cv-00365-DAE-AWA
	)	
GRANDE COMMUNICATIONS	)	
NETWORKS LLC,	)	
	)	
Defendant.	)	

**DEFENDANT GRANDE COMMUNICATIONS NETWORKS LLC'S  
STATEMENT OF CLAIMS OR DEFENSES**

Pursuant to Local Rule CV-16(e) and the Court's Order Setting Jury Selection/Trial and Related Deadlines (ECF No. 275), Defendant Grande Communications Networks, LLC, ("Grande") submits the following statement of its claims or defenses to be used in voir dire:

Grande disputes the plaintiffs' claim that Grande is liable for acts of copyright infringement allegedly committed by users of its network. Grande asserts that it is merely an internet service provider and never induced or encouraged anyone to infringe the plaintiffs' copyrights. Grande contends that Rightscorp, which claims to have detected copyright infringement on Grande's network, cannot accurately or reliably identify infringement, and that Rightscorp destroyed or otherwise failed to preserve the evidence of its alleged detections. Grande also contends that Rightscorp's emails to Grande were flawed and unreliable, because of defects in Rightscorp's system and because the emails lacked any supporting or verifiable evidence. Grande therefore contends that the plaintiffs are not entitled to recover any damages, and furthermore, that the plaintiffs' requested damages are excessive and not supported by evidence of actual harm.

Dated: January 28, 2020

By: /s/ Richard L Brophy

Richard L. Brophy  
Zachary C. Howenstine  
Margaret R. Szewczyk  
Abigail L. Twenter  
ARMSTRONG TEASDALE LLP  
7700 Forsyth Blvd., Suite 1800  
St. Louis, Missouri 63105  
Telephone: 314.621.5070  
Fax: 314.621.5065  
rbrophy@armstrongteasdale.com  
zhowenstine@armstrongteasdale.com  
mszewczyk@armstrongteasdale.com  
atwenter@armstrongteasdale.com

J. Stephen Ravel  
Texas State Bar No. 16584975  
J.R. Johnson  
Texas State Bar No. 24070000  
Diana L. Nichols  
Texas State Bar No. 00784682  
KELLY HART & HALLMAN LLP  
303 Colorado, Suite 2000  
Austin, Texas 78701  
Telephone: 512.495.6429  
Fax: 512.495.6401  
Email: steve.ravel@kellyhart.com  
jr.johnson@kellyhart.com  
diana.nichols@kellyhart.com

ATTORNEYS FOR DEFENDANT  
GRANDE COMMUNICATIONS  
NETWORKS LLC

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 28, 2020, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

/s/ Richard Brophy

Richard L. Brophy